

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: GLUCAGON-LIKE PEPTIDE-1	:	CIVIL ACTION
RECEPTOR AGONISTS (GLP-1 RAS)	:	
PRODUCTS LIABILITY LITIGATION	:	
	:	
	:	
THIS DOCUMENT RELATES TO:	:	MDL No. 3094
	:	2:24-md-03094-KSM
<i>ALL ACTIONS / ALL CASES</i>	:	
	:	

**JOINT MOTION FOR THE ENTRY OF
PROPOSED CASE MANAGEMENT ORDER**

All Defendants and Plaintiffs (together, the “Parties”), respectfully, and by counsel, hereby jointly move for the entry of the attached Proposed Case Management Order governing the schedule for Defendants’ Motion to Dismiss the Master Complaint (Doc. No. 294).

Dated: November 27, 2024

Respectfully submitted,

/s/ Loren H. Brown

Loren H. Brown (admitted *pro hac vice*)
 Lucas P. Przymusinski (admitted *pro hac vice*)
DLA PIPER LLP (US)
 1251 Avenue of the Americas
 27th Floor
 New York, NY 10020-1104
 Telephone: (212) 335-4846
 Facsimile: (212) 335-4501
 loren.brown@us.dlapiper.com
 lucas.przymusinski@us.dlapiper.com

Ilana H. Eisenstein (PA Bar No. 94907)
 Raymond M. Williams (PA Bar No. 90771)
DLA PIPER LLP (US)
 1650 Market Street, Suite 5000
 Philadelphia, PA 19103
 Telephone: (215) 656-3300
 Facsimile: (215) 606-3301
 ilana.eisenstein@us.dlapiper.com
 raymond.williams@us.dlapiper.com

Matthew A. Holian (admitted *pro hac vice*)
Katherine W. Insogna (admitted *pro hac vice*)
DLA PIPER LLP (US)
33 Arch Street, 26th Floor
Boston, MA 02110
Telephone: (617) 406-6000
Facsimile: (617) 406-6100
matt.holian@us.dlapiper.com
katie.insogna@us.dlapiper.com

*Attorneys for Defendants Novo Nordisk A/S
and Novo Nordisk Inc.*

Dated: November 27, 2024

/s/ Samuel W. Silver

Samuel W. Silver (PA Bar No. 56596)
Catherine M. Recker (PA Bar No. 56813)
Bruce P. Merenstein (PA Bar No. 82609)
Abigail T. Burton (PA Bar No. 334450)
WELSH & RECKER, P.C.
306 Walnut Street
Philadelphia, PA 19106
(215) 972-6430
ssilver@welshrecker.com
cmrecker@welshrecker.com
bmerenstein@welshrecker.com
aburton@welshrecker.com

James F. Hurst, P.C. (admitted *pro hac vice*)
Renee D. Smith (admitted *pro hac vice*)
Diana M. Watral, P.C. (admitted *pro hac vice*)
Mark Premo-Hopkins (admitted *pro hac vice*)
KIRKLAND & ELLIS
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
james.hurst@kirkland.com
renee.smith@kirkland.com
diana.watral@kirkland.com
mark.premohopkins@kirkland.com

Attorneys for Defendant Eli Lilly & Company

Dated: November 27, 2024

/s/ Parvin K. Aminolroaya
Parvin K. Aminolroaya
SEAGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (973) 639-9100
paminolroaya@seegerweiss.com

/s/ Jonathan Orent
Jonathan Orent
MOTLEY RICE LLC
40 Westminster Street, 5th Floor
Providence, RI 02903
Telephone: (401) 457-7700
jorent@motleyrice.com

/s/ Sarah Ruane
Sarah Ruane
WAGSTAFF & CARTMELL
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: (813) 701-1123
sruane@wcllp.com

/s/ Paul Pennock
Paul Pennock
MORGAN & MORGAN
199 Water Street, Suite 1500
New York, NY 10038
Telephone: (212) 738-6299
ppennock@forthepeople.com

Co-Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on November 27, 2024, a true and correct copy of the foregoing Joint Motion for the Entry of Proposed Case Management Order was electronically filed using the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Loren H. Brown _____

Loren H. Brown